

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

Ashley Prim

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CASE NUMBER: 24-287-DSC13

Debtor(s)

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MOTION FOR RELIEF

COMES NOW the Petitioner, District Capital LLC., by and through its attorney, Norman G. Winston, Jr., and states as follows:

1. That the Debtor, Ashley Prim, signed a six (6) month and two (2) day lease agreement for the premises known as 6600 Avenue K Bessemer, AL 35020. Term of lease: 08.01/2023 through 02.01.2024
2. Petitioner was notified by their attorney, Norman G. Winston, Jr., that Debtor has an active Chapter 13 Bankruptcy Petition under Case Number 24-287-DSC13, filed on January 30, 2024.
3. The Debtor has not paid rent for the months of October 2023 rent balance through February 2024 and is currently in arrears in the sum of \$4,895.00 plus costs.

Wherefore, the Petitioner moves this Court to lift the automatic stay and allow the Petitioner herein to proceed in State Court to recover possession of said property and Petitioner will file a claim in this proceeding after possession is recovered.

Dated: February 15, 2024

WINSTON, WINSTON, JENKINS &CHASTAIN, LLC

/s/Norman G. Winston, Jr.

NORMAN G. WINSTON, JR.

Attorney for Petitioner

1744 Oxmoor Road

Homewood, AL 35209

(205) 933-2300

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above forgoing motion upon all parties of interest, and the Chapter 13 Trustee, by electronic or first-class United States Mail, properly addressed and postage prepaid, on February 15, 2024

/s/Norman G. Winston, Jr.

OF COUNSEL

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
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AFFIDAVIT

My name is Eon I Lew, and I am a managing member of District Capital LLC located at 1100 S. Flower Street, Ste. 3300 Los Angeles, CA 90015. I am familiar with the company records regarding Ashley Prim and the events which have occurred regarding her occupancy at 6600 Avenue K Bessemer, AL 35020. Those facts are:

1. Ashley Prim signed a lease agreement for the premises known as 6600 Avenue K Bessemer, AL 35020, on August 3, 2023.
2. I was notified by my attorney, Norman G. Winston, Jr., that the tenant, Ashley Prim, has an active Chapter 13 Bankruptcy Petition under case number 24-287-DSC13.
3. Ashley Prim has not paid rent for the months of October 2023 rent balance through February 2024 rent and is still residing in the premises.

Dated this the 15th day of February 2024.


EON I. LEW

STATE OF ALABAMA)
COUNTY OF JEFFERSON)

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Before me appeared, ~~Tish Weaver~~, who after being duly sworn, deposes and says that the facts and information contained herein in his affidavit are true and correct to the best of his belief and knowledge.

Dated this the 15th day of February 2024.


NOTARY PUBLIC



Keeshan Cotten Keeton
Notary Public, Alabama State At Large
Commission Expires October 3, 2027